

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re:

SAMIA EL-MOSLIMANY

Debtor

Case No. 18-14820-CMA  
Chapter 7

**SUPPLEMENTAL DECLARATION OF  
SAMIA EL-MOSLIMANY**

Samia El-Moslimany hereby declares under penalty of perjury as follows:

1. I am the debtor in this case, and make this declaration on my personal knowledge.

2. There is apparently some confusion with respect to the printout titled "Newest Loan from Aziza", which is Exhibit B to the Declaration of Aziza Al-Yousef, Docket 81-3. An additional copy of the report is attached hereto, designated as "Exhibit B". I prepared this report when I had access to one of my Saudi bank accounts (which have from time to time been frozen). I know the contents of the report and how it was sorted and filtered.

3. First, I filtered my bank records to show only incoming transfers from Sara Al-Haidar, who is Aziza Al-Yousef's daughter, and who handles financial transactions for her mother when Aziza herself cannot do so (for instance, when she is incarcerated for her women's rights activities). I set the date range in May and June 2017, which is when the loans in question were made. This resulted in the listing of eight incoming transfers.

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SUPPLEMENTAL DECLARATION - 1

1           4. The transfers themselves are denominated in Saudi Riyals, and the amount of  
2 each transfer is listed under the column "Credit". One dollar converts to 3.75 Riyals.  
3 The trustee has assumed that the report lists dollars, which is not correct. The numbers  
4 would not match if it did. The reason there are multiple transfers is that Sara was  
5 allowed to transfer only 50,000 Riyals per day. (The two transactions on May 28 were  
6 actually on different days, but due to the time difference between the US and Saudi  
7 Arabia, they appeared on the list as both being May 28.)

8           5. The "Balance" column lists the balance in my bank account, not the balance of  
9 my debt to Aziza. The trustee has mis-construed the document when he says, at Docket  
10 94, page 3-4, that "the same report shows that as of June 1, 2017, three days after the  
11 alleged \$100,000 transfer, the balance owed by the Debtor to Ms. Yousef was only  
12 \$39,949.14." The report shows nothing of the kind. What it shows is that in late May,  
13 2017, Aziza Al-Yousef, through her daughter Sara Al-Haidar, loaned me 375,000 Riyals,  
14 equivalent to \$100,000. I spent much of the money right away, as I had large attorney  
15 fee bills to pay for the litigation with Hayat Sindi.

16           6. To further show that the "Balance" column does not show the balance of the  
17 debt to Aziza, note that the amount in the "Balance" column does not always change in  
18 the amount indicated by the "Credit" column. For instance, the balance after the initial  
19 50,000 Riyal transfer is 51,719.09. If the "Balance" column showed the balance of the  
20 debt, then when the next transfer, in the amount of 44,000 Riyals, was added, the result  
21 should have been 95,719.09 Riyals, but it is not; it is 87,996.79. Several of the other line  
22 items do not add up as they should if the "Balance" column represented the loan  
23 balance. All this simply indicates that the "Balance" column lists my bank balance, not  
24 the balance of my debt to Aziza.

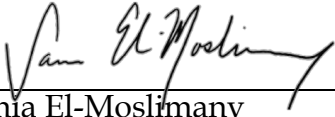
25           7. The listing of my debt to Aziza on my bankruptcy schedules was my best

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28 SUPPLEMENTAL DECLARATION - 2

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1 estimate of the amount owed. Now that we have gone through the work of assembling  
2 as many of the documents as we can, Aziza and I agree that the debt is actually  
3 \$574,537.00.

4 Dated: September 16, 2019

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8 Samia El-Moslimany  
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28 SUPPLEMENTAL DECLARATION - 3

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## Exhibit B

Newest Loan from Aziza

Transaction Date	Value Date	Description	Debit	Credit	Balance
5/21/17 0:00	5/21/17 0:00	LOCAL & INT INCOMING TRANSFER(SARIE) /09:35 /SAR50000 /REM:SARA A. S. ALHAIDAR /ARNBSARIXXX	0	50,000	51,719.09
5/23/17 0:00	5/23/17 0:00	INCOMING SARA A. S. ALHAIDAR	0	44,000	87,996.79
5/24/17 0:00	5/24/17 0:00	LOCAL & INT INCOMING TRANSFER(SARIE) /09:28 /SAR50000 /REM:SARA A. S. ALHAIDAR /ARNBSARIXXX	0	50,000	137,996.79
5/28/17 0:00	5/28/17 0:00	LOCAL & INT INCOMING TRANSFER(SARIE) /11:13 /SAR50000 /REM: S. ALHAIDAR /ARNBSARIXXX	0	50,000	232,697.03
5/28/17 0:00	5/28/17 0:00	LOCAL & INT INCOMING TRANSFER(SARIE) /11:16 /SAR50000 /REM: S. ALHAIDAR /ARNBSARIXXX	0	50,000	282,697.03
5/29/17 0:00	5/29/17 0:00	LOCAL & INT INCOMING TRANSFER(SARIE) /10:47 /SAR50000 /REM: S. ALHAIDAR /ARNBSARIXXX	0	50,000	332,697.03
5/30/17 0:00	5/30/17 0:00	LOCAL & INT INCOMING TRANSFER(SARIE) /11:11 /SAR50000 /REM: S. ALHAIDAR /ARNBSARIXXX	0	50,000	149,331.03
6/1/17 0:00	6/1/17 0:00	INCOMING SARA A. S. ALHAIDAR	0	31,000	39,949.14
				375,000	